

**Postal Regulatory Commission  
Office of the Chief Admin. Officer**

**MAY 20 2011**

1333 E. Meeting House Rd.  
P.O. Box 64 Gwynedd, PA  
May 19, 2011

Shoshana Grove, Secretary of the Commission  
Postal Regulatory Commission  
901 New York Avenue NW, Suite 200  
Washington, D.C. 20268-0001

Dear Ms. Grove:

My public representative advised me, as the appellant in case A2011-15, the appeal of the closing of the Gwynedd Post Office (PA 19436), to resend my request for a postponement in the scheduled closing of the Gwynedd Post Office, in which I restate the points I made in my "Petition" sent this morning in the form of a notarized affidavit. That affidavit, along with a more formal Application for Suspension Pending Review, is included in this mailing. In it I summarize some of the key points of contention that the appealing side has with the rationale for the closure and the relevant facts as stated by USPS.

I regret that I am having to learn the proper procedures for an appeal to the PRC as I go along. I now realize that the Application for Suspension Pending Review should have been filed along with the initial paperwork seeking to open an appeal. Nevertheless, I did manage to get the case on the docket. PRC's schedule for filings (USPS by May 18, appellants by June 7) could become meaningless if the closure proceeds on May 27 and is allowed to be considered final and irrevocable. Therefore, I am pleading for forbearance of my procedural ignorance in not acting in this respect at an earlier date. I am making this second mailing as instructed by my public representative, Mr. Richard Oliver.

I earnestly maintain that the appeal process has already brought to the PRC's attention a number of claims disputing USPS' rationale for the closure that potentially have merit. Furthermore, I assure all parties involved that appellant has acted in good faith, and is scrambling to comply with required procedure despite the unfortunate lapse in this phase of the process. In upcoming days, I hope that by assiduously coordinating with my public representative, I will be able to comply more perfectly with PRC requirements for appeals. Please consider all the requests broached in this second mailing.

Thank you very much for your attention.

Sincerely,

*Christina Surowiec*

Christina Surowiec

cc: Anthony Alverno, atty. for USPS

ORIGINAL COVER LETTER

Mailed morning of May 19

1333 E. Meeting House Rd.  
P.O. Box 64 Gwynedd, PA  
May 18, 2011

Shoshana Grove, Secretary of the Commission  
Postal Regulatory Commission  
901 New York Avenue NW, Suite 200  
Washington, D.C. 20268-0001

Dear Ms. Grove:

Please accept the following sheet as an urgent petition by which, on behalf of the affected residents of the community of Gwynedd, Township of Lower Gwynedd, Pennsylvania, I request that the Commission postpone the scheduled closing of the Gwynedd Post Office (or "branch") that is still scheduled to take place on May 27, a week from this coming Friday as this is being written on Wednesday night.

I am writing as the recognized appellant in the active case for which the PRC has assigned docket number A2011-15, but I expect to demonstrate solid community support for the appeal of the closing. The USPS posted, as ordered by the Commission, documentation purporting to justify the closure, but after preliminary inspection of this material I conclude that various cogent objections to the reasons USPS uses to justify the closure have not been addressed.

Please note that the Commission's timeline for submission of materials specified receipt of USPS documentation by May 18, and filing of all appellant documentation by June 7. The appeal will be a dead letter if the closing is allowed to occur between those two dates. Furthermore, the USPS documentation is incomplete, as it includes no full or remotely accurate record of the March 3 meeting of USPS personnel discussing the closure with community members at our municipal building, or rather announcing it. A USPS employee was observed taking copious notes at this meeting, and on May 7 I wrote her requesting to see those notes – I would expect at least a summary of those notes, with an explanation of what happened to them, if the actual notes were not available. I have not received any response. A thorough review of the proceedings at this town meeting, I believe, would go a long way toward showing the procedurally slipshod and factually inaccurate approach taken by USPS personnel in their effort to close down the Gwynedd Post Office.

Thank you for your attention.

Sincerely,

Christina Surowiec

### **Application for Suspension Pending Review**

The undersigned, appellant in case A2011-15 seeking to retain service at the Gwynedd (PA 19436) Post Office, urgently requests a suspension of the closure of that facility scheduled to come into effect at the close of business Friday, May 27.

This application is made in keeping with §3001.114, and appellant recognizes that it should have accompanied the initial effort to open an appeal. Appellant is trying to learn required procedures before the PRC as she goes along, and apologizes for this lapse.

As the Commission set an appellant filing deadline of June 7, allowing a final closure on May 27 could potentially void the entire case. Appellant and the community members backing the appeal have acted in good faith, and those who wish the appeal to be heard maintain that potentially telling claims showing lack of justification for closing the post office at Gwynedd have already been brought to the Commission's attention. Please accept this application for suspension.

A notarized affidavit outlining points of contention between appellant's view of the matter and documentation provided by USPS is included in this mailing.

To:  
US Postal Regulatory Commission

From:  
Christina Surowiec, appellant for case A2011-15

Appellant urgently requests that the PRC suspend the announced closure of the Gwynedd (PA 19436) Post Office (or branch), scheduled to take place May 27, 2011.

(signed) Christina Surowiec (date) 5/19/2011

## PETITION

**To:**  
**U.S. Postal Regulatory Commission**

**From:**  
**Christina Surowiec on behalf of Affected Residents appealing Gwynedd Post Office closure**

**Re: Active Case A2011-15**

Appellant urgently requests delay of the closure of the Gwynedd Post Office (PA 19436) while the appeal is active. Final closure is scheduled after business day ends Friday, May 27. Appellant filings are due before the Commission on June 7. USPS documentation was filed by the due date, May 18, but it fails to respond to multiple issues raised by appellant.

These issues include (but are not necessarily limited to):

- (A) Evidence that the closing was fully decided beforehand, and that the show of USPS seeking community input was basically a sham – “backfill” to provide, albeit ineptly, an appearance of legally required procedures being followed
- (B) USPS’ unresponsiveness to the compelling claim that a physically superior site is being abandoned with customers shunted to a significantly less satisfactory site with major parking and access problems
- (C) USPS’ failure to present any operating cost data on the site that is being retained and designated to absorb Gwynedd Post Office customers, and failure to consider data on the apparent financial viability of the Gwynedd location
- (D) In a personal conversation with USPS customer service analyst Mr. Mike Roberts, who also superintended the contentious March 3 community meeting at the Lower Gwynedd Township municipal building, I recently received an explanation of an issue raised but not answered at said meeting. In the face of uncontested statements that the Gwynedd Post Office receives approximately double the annual cost of its lease in box rents alone, Mr. Roberts claimed that closing the facility would save USPS “about \$50,000, with no layoffs.” How could this be? By phone ten days to two weeks ago, he told me he based his estimate on a policy being implemented throughout the large service area administered by Philadelphia’s Central Post Office of gradually downsizing staff through attrition. Staff now employed at Gwynedd would be offered a transfer. But to single out Gwynedd, a financially viable site, and make this local area bear the brunt of a policy meant to adjust the cost structure over hundreds of square miles, is inappropriate and unfair. Numerous less financially viable USPS sites surely exist in the defined service region, i.e. the greater Philadelphia metropolitan area.
- (E) Improvements to U.S. Route 202 now nearing completion will actually make the Gwynedd location a more desirable site for a post office. Although “limited access” due to the 202 road project was initially cited by USPS as giving impetus to the closure, this reason does *not*

appear in the text of USPS' "Final Determination" to close. The Gwynedd Post Office stands at the intersection of Meeting House Road and US 202. In the original road configuration, Gwynedd Post Office customers accessing it from southbound Route 202 need to make a sharp left turn off a major highway. In the new configuration, the last segment of Meeting House Road as it nears 202 is being rerouted to the right to create a safer, square intersection with the highway. The pavement of the original Meeting House Road would remain in place as a driveway or cul-de-sac leading to the Post Office and adjoining properties. Customers arriving via Route 202 would find a safer turn at the new Meeting House Road access, and simply have to make a quick right to reach the Post Office. Customers approaching via Meeting House Road would travel exactly the same route to the Post Office as before; if they subsequently choose to take Route 202, their approach would be minimally longer, by a couple of hundred yards, but decidedly safer. It is important to note that the visibility of the Gwynedd Post Office to drivers using Route 202 is not affected by the road project. Traffic on 202, a major highway now receiving a major upgrade, is higher volume than traffic past any nearby USPS location. The Gwynedd Post Office is the only USPS facility along Route 202 between the county seat cities of Norristown (Montgomery) and Doylestown (Bucks), a distance of 17.5 miles. A post office here can expect to draw a reliable stream of incidental customers (who don't live in the area, but travel the road) for transactions such as stamp purchases and package mailings. Conversely, closing the Gwynedd Post Office is likely to exacerbate USPS' overall decline in business volume, as the net number of box holders will decline, probably precipitously, and all package shipping to and from the large Foulkeways retirement complex, adjacent to the Gwynedd Post Office, will effectively be ceded to UPS and FedEx. The majority of affected residents, if the USPS gets its way with the closure, are likely to opt for carrier service to a home mailbox (as the USPS documentation itself seems to recommend), and this shift in the distribution of USPS services rendered would require additional mail carrier workload, further eroding any purported cost savings.

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- (F) Gwynedd is a historic community, dating to the late 1600s. A post office has stood at this location since 1810. Gwynedd was one of the first 35 post offices in the entire state of Pennsylvania. Numerous local residents, along with voicing displeasure at the practical inconvenience that closure of the Gwynedd Post Office would entail, have expressed to me their pointed outrage at the disdain for area heritage embodied in the USPS' closure determination.
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***Appellant urgently petitions the Postal Regulatory Commission to suspend the scheduled closure of Gwynedd Post Office (PA 19436) pending submission of all appeal filings and subsequent consideration of the appeal by the Commission.***

(signed)

Christina Surowiec  
Re Active Case Docket #A2011-15

### **Affidavit of Christina Surowiec**

My name is Christina Surowiec. I am 60 years old, work as a freelance writer and consultant, and reside at 1333 E. Meeting House Road, P.O. Box 64, Gwynedd PA 19436.

I am the recognized appellant to the PRC in the active case docketed under number A2011-15, which appeals the announced closing of the Gwynedd Post Office (or branch) by the USPS. In this capacity I have reviewed documentation on the matter filed by USPS with the PRC on May 18, 2011. I contest the completeness of this USPS documentation as well as some matters of fact and interpretation. Furthermore, attached to this affidavit is an urgent application for suspension of the USPS-ordered closure of the Gwynedd location scheduled for May 27. The following items are salient divergences between appellant's understanding and interpretation of the situation, and the parallel presentation of the matter by USPS.

(1) The USPS documentation does not accurately convey community concerns voiced at the public meeting held at Lower Gwynedd Township Bldg. on March 3. Appellant wrote Philadelphia-based USPS personnel who ran this meeting asking for documentation (notes taken by Donna Saulino) and has not received the material requested or any other response.

(2) USPS proposes that Gwynedd box customers be absorbed into the Spring House branch. The Spring House branch has limited parking for its existing customers, and access is difficult and dangerous. A left turn onto Bethlehem Pike, the likely egress for Gwynedd residents using the Spring House facility, is particularly hazardous. USPS documentation now on the segment of the PRC site dedicated to active case A2011-15 does not address this concern except to state that the Spring House site has "parking and access."

(3) USPS has failed to present financial data to justify the closure of a revenue-generating facility.

(4) USPS initially claimed access problems arising from the large US 202 road project were a main reason, possibly the topmost reason, for closing the Gwynedd Post Office. Note that the USPS documentation uploaded to the PRC site May 18 mentions this factor in the letter to patrons sent in February, but not in the Final Documentation. Appellant can demonstrate that road access to the building will remain in place, with a safer reconfiguration of the Meeting House Road-Route 202 intersection.

(5) Appellant wishes to note that the visibility of the Gwynedd Post Office to drivers using Route 202 is not affected by the road project. Traffic on 202, a major highway now receiving a major upgrade, is higher volume than traffic past any nearby USPS location. The Gwynedd Post Office is the only USPS facility along Route 202 between the county seat cities of Norristown (Montgomery) and Doylestown (Bucks), a distance of 17.5 miles. A post office here can expect to draw a reliable stream of incidental customers (who don't live in the area, but travel the road) for transactions such as stamp purchases and package mailings. Conversely, closing the Gwynedd Post Office is likely to exacerbate USPS' overall decline in business volume, as the net number of box holders will decline, probably precipitously, and all package shipping to and from the large Foulkeways retirement complex, adjacent to the Gwynedd Post Office, will effectively be ceded to UPS and FedEx. Foulkeways residents probably constitute the majority of the elderly population mentioned in the USPS documentation on the case identified as the chief citizen concern expressed at the March 3 public meeting. Appellant's recollection of the meeting is that taking a convenient facility away from elderly persons was certainly a concern, but access problems at Spring House and lack of financial justification for the closure by USPS were of equal importance.

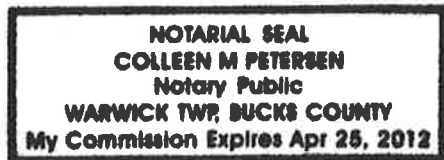
The USPS in its materials submitted on the case seems to anticipate that migration of box customers to home delivery is a likely result of the closure. Carrier time for the added home delivery, along with a large net loss of box customers and the abandonment of a retail site on a road with more traffic than any remaining USPS facility in the general area, all suggest that the closure of the Gwynedd Post Office is an inappropriate move with respect to the announced USPS objective of maximizing cost savings.

I declare that, to the best of my knowledge and belief, the information herein is true, correct and complete.

Christina Surowiec  
Christina Surowiec

5 / 19 / 2011

STATE OF PENNSYLVANIA, COUNTY OF MONTGOMERY, ss:



Colleen M. Petersen  
Notary Public

\_\_\_\_\_  
Title (and rank)

My commission expires April 25, 2012